

Before the  
Federal Communication Commission  
Washington, D. C. 20554

Comments, in the matter of Amendment	)	RM-10783
of Part 97 of the Commission's	)	RM-10785
Amateur Service Rules to Eliminate	)	RM-10786
Morse Code Proficiency Testing	)	RM-10787

To: The Commission

**In General Support of Elimination of All Morse Code Proficiency Testing Requirements:**

There are many good things to say about Morse code, but placing it as a testing requirement has always been a major mistake.

1. It has proven over several decades to be a major obstacle to the growth and vitality of Amateur radio. Amateur radio now struggles on the edge of public acceptance and viability by playing up such noteworthy roles as disaster communications and youth technical training. However, most people **still** have never even heard of it, and those who have consider it some kind of "CB thing." This is because Amateur Radio is a tiny, unknown entity, and it is tiny because of a foolish decision, made decades ago, to make Morse code testing a **requirement**, and each subsequent decision to keep it has further strangled Amateur Radio.
2. The original intent of the code proficiency requirement has never been realized. The government has never called up this great imaginary pool of self-trained radiomen, even for voice communications, much less Morse code, which is militarily obsolete.
3. The code requirement has always been used as a "gatekeeper" to help keep a small and elite club small and elite. The elimination of the requirement is many long decades overdue: The general citizenry deserves the opportunity to participate in Amateur Radio whether they desire to learn Morse code or not. **It is not a matter of whether they can, or even should, but whether they desire to learn it.** Those who use and cherish Morse code should be allowed to do so, but **they have no right** to use Commission Rules to cram it down everyone else's throats!
4. Morse code should have always been a specialty, with a license endorsement. Those genuinely interested in it could have pursued it with passion, and been rewarded for doing so. Others, with no interest in it, could have entered the ranks of radio experimenters, and with such an infusion of new talent, Amateur radio would be a much larger group, with much more technical prowess, political clout, public service, and protected bandwidth, than it has today.
5. If those with no interest in Morse code should be banned from all international HF communications, then perhaps all those with no interest in PSK, RTTY, Packet, and SSTV should also be banned! It does not make sense, and the WARC members have realized this fact. It is time to follow their lead and open Amateur radio communications to **all** interested parties – not just those with the desire and determination to learn Morse code!
6. Amateur Radio, and Amateur Radio Operators, are not solely defined by Morse code proficiency. It, and we, are defined by **ALL** of the many facets of the hobby.
7. The Morse code requirement has ensured that the Ham radio community is so tiny, so weak, and so unknown by an unsympathetic and ignorant public (and public officials) that now, every little legal or spectrum issue becomes a major threat.

8. Untold thousands of bright young people -- engineers, communications industry professionals, and advanced hobbyists -- have been denied access to Amateur Radio because they had no time nor interest in learning Morse code. They have grown up and are now **decision makers** in the government and communications industry, and they **have no knowledge of, nor sympathy for**, Amateur Radio. Proof? BPL and RFID tags. Who would believe that such stupid, inept, foolish, **dangerous** concepts would have ever even been imagined, much less **seriously considered**, and even **strongly promoted** by senior officials and communications industry experts? A much broader public participation in Amateur radio would fill such decision-making positions with people who have **practical** knowledge of radio technologies.

The naysayers have always contended that the removal of the Morse code requirement would surely cause a flood of unruly Cbers and such-like to swamp Amateur bands and destroy Amateur radio. This has been repeatedly proven a false assumption, because:

1. Most of such people are no more likely to pass a technical written exam than they are to pass a code test, and those relatively few who would, have already done so.
2. A large percentage of Amateur radio operators are ex-Cbers, and they are not "destroying" the bands nor "ruining" Amateur radio for anyone.
3. Most Amateurs have **not once** used Morse code since their license exam, and have no intention of doing so -- and this is not "ruining" nor "destroying" Amateur radio.

I sincerely hope that Morse code CW never goes away. It has its aficionados, its rich tradition, and its useful place in radio communications. We all know the advantages of CW for weak-signal work. However, the **requirement** was a mistake that became a **cherished tradition!** The time has come -- no, is long overdue -- to stop strangling Amateur Radio with an unnecessary code proficiency testing requirement.

The code requirement kept me out of Amateur Radio for over 30 years. When finally available to me, I passed my exams with scores of 100/98/100/100, because I really studied the material and substantially surpassed the requirements. Nevertheless, there are still some who think one is not "qualified" to be an Extra class ham unless he can copy 20 WPM. It's ridiculous! There is a **LOT** more to Ham Radio than just Morse code proficiency! I wish I could have been contributing to and enjoying ham radio for the past 30 years -- and I am but one of many, perhaps millions.

#### **In Conclusion:**

People who are fighting to keep the Morse code proficiency requirement are **not** fighting for the future of Amateur Radio, they are fighting for a cherished tradition, and **that is the core fact of the whole issue**. Morse code is still as valuable as it ever was, but the testing requirement is no longer necessary, sensible, nor desirable.

I strongly urge the immediate ending of the Morse code proficiency testing requirement, so that Amateur Radio may flourish with an infusion of new talent.

Sincerely,

Harold Melton, KV5R  
1822 County Road 3618  
Murchison TX 75778